

1 RENE L. VALLADARES
Federal Public Defender
2 State Bar No. 11479
BRIAN PUGH
3 Assistant Federal Public Defender
411 E. Bonneville, Ste. 250
4 Las Vegas, Nevada 89101
(702) 388-6577/Phone
5 (702) 388-6261/Fax
Brian_Pugh@fd.org

6 Attorney for Alexander Gallegos
7

8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,
11 Plaintiff,
12
13 v.
14 ALEXANDER GALLEGOS,
15 Defendant.

Case No. 2:11-cr-00455-GMN-CWH

**STIPULATION TO CONTINUE
REVOCATION HEARING**
(Third Request)

16 IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas A.
17 Trutanich, United States Attorney, and Nicholas Dickinson, Assistant United States Attorney,
18 counsel for the United States of America, and Rene L. Valladares, Federal Public Defender,
19 and Brian Pugh, Assistant Federal Public Defender, counsel for Alexander Gallegos, that the
20 Revocation Hearing currently scheduled on June 17, 2020, be vacated and continued to date
21 and time convenient to this Court, but no sooner than thirty (30) days.

22 This Stipulation is entered into for the following reasons:

- 23 1. Counsel for the defendant needs additional time to conduct investigation and to
24 prepare for the revocation hearing in this case.
25
26 2. In light of the COVID-19 pandemic, the defendant and counsel for the defendant
are attempting to adhere to recommended social distancing practices, including teleworking and

1 minimizing personal interactions to those that are absolutely necessary. Based upon age (60),
2 counsel for the defendant falls into an at-risk category. For these reasons, investigation and
3 hearing preparation are difficult.

4 3. The additional time requested herein is not sought for purposes of delay, but
5 merely to allow counsel for defendant sufficient time within which to be able to effectively and
6 complete investigation of the discovery materials provided.

7 4. The defendant is not in custody and agrees with the need for the continuance.

8 5. The parties agree to the continuance.

9 This is the third request for a continuance of the revocation hearing.

10 DATED this 12 day of June, 2020.

11
12 RENE L. VALLADARES
Federal Public Defender

NICHOLAS A. TRUTANICH
United States Attorney

13
14 By /s/ Brian Pugh

By /s/ Nicholas Dickinson

15 BRIAN PUGH
16 Assistant Federal Public Defender

NICHOLAS DICKINSON
Assistant United States Attorney

1 **UNITED STATES DISTRICT COURT**

2 **DISTRICT OF NEVADA**

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 ALEXANDER GALLEGOS,

7 Defendant.

Case No. 2:11-cr-00455-GMN-CWH

ORDER

9
10 IT IS THEREFORE ORDERED that the revocation hearing currently scheduled for
11 Wednesday, June 17, 2020 at 10:30 a.m., be vacated and continued to July 29, 2020, at the
12 hour of 11:00 a.m. in Courtroom 7D before Judge Gloria M. Navarro.

13 **IT IS FURTHER ORDERED** that this is a firm hearing date and no further
14 continuances will be granted without a hearing to demonstrate a sufficient basis for delay.

15 DATED this 15 day of June, 2020.

16
17 
18 _____
19 UNITED STATES DISTRICT JUDGE
20
21
22
23
24
25
26